

Joseph & Norinsberg LLC

Fighting for Employee Justice



Queens Office
69-06 Grand Avenue, 3rd Floor
Maspeth, New York 11378

Manhattan Office
110 East 59th Street, Suite 2300
New York, New York 10022

Newark Office
One Gateway Center, Suite 2600
Newark, New Jersey 07102

Philadelphia Office
1515 Market Street, Suite 1200
Philadelphia, Pennsylvania 19102

Boston Office
225 Franklin Street, 26th Floor
Boston, Massachusetts 02110

Orlando Office
300 N. New York Ave, Suite 832
Winter Park, Florida 32790

Arjeta Albani, Esq.
arjeta@employeejustice.com

January 30, 2025

VIA ECF

Hon. Ronnie Abrams
United States District Court Judge
Southern District of New York
United States Courthouse
40 Foley Square, Courtroom 1506
New York, New York 10007

**Re: Tavon Turner v. SMMB Inc. d/b/a Purple Plains
Case No. 1:24-cv-8282 (RA)**

Dear Judge Abrams,

We represent Plaintiff Tavon Turner (“Plaintiff”) in the above referenced ADA matter. We write now with the Defendant’s consent, to respectfully inform the Court that the Parties have reached a settlement in principle in this action.

In light of the anticipated settlement, the parties respectfully request that all currently pending deadlines and conferences in this action be adjourned *sine die*. The parties intend to electronically file a proposed Consent Decree and Stipulation of Discontinuance within 30 days.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

JOSEPH & NORINSBERG, LLC

Arjeta Albani, Esq.
Attorneys For Plaintiff

110 East 59th Street, Suite 2300
New York, New York 10022
(212) 227-5700
Fax No. (212) 656-1889
arjeta@employeejustice.com

CC:

Edward J. Phillips, Esq.
445 Hamilton Avenue, 15th Floor
White Plains, NY 10601
ephillips@kblaw.com